

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	
	§	
RICHARD HALL (01)	§	Case No. 3:18-CR-00623 (S)
SCOTT SCHUSTER (02)	§	
DUSTIN RALL (03)	§	
JOHN LE (04)	§	
GEORGE LOCK PARET (05)	§	
TURNER LUKE ZEUTZIUS (06)	§	
QUINTAN COCKERELL (07)	§	

DECLARATION OF RICHARD HALL

1. My name is Richard Hall. I am over the age of eighteen and competent to make this declaration. I submit the declaration in support of my motion to suppress the evidence seized in the search of 1000 West Weatherford Street in Fort Worth on September 15, 2016.

2. At the time of the search, I was part-owner (through an entity in which I held an ownership interest) of the building that was searched at 1000 West Weatherford Street.


3. At the time of the search, I was part-owner (through entities in which I held an ownership interest) of Rxxpress Pharmacy and Xpress Compounding (collectively "the pharmacies"), both of which had their offices in the building at 1000 West Weatherford Street.

4. At the time of the search, I maintained an office at 1000 West Weatherford Street. I used the office to conduct the pharmacies' business. My office was in a part of the building that was not accessible to persons not affiliated with the pharmacies. I expected that my office would remain private and would not be exposed to anyone not affiliated with the pharmacies without my consent.

5. I understand that the agents conducting the search imaged and searched all or part of the computers that the pharmacies used to conduct their business. Those computers were password protected. They were not accessible to third parties who did not have the necessary password. I expected that the contents of the pharmacies' computers would remain private and would not be exposed to anyone outside of the pharmacies without the pharmacies' consent.

6. I understand that the agents conducting the search imaged all or part of a personal laptop computer that I had left in my office at 1000 West Weatherford Street. The laptop was password protected. It was not accessible to third parties who did not have the password. I kept a variety of business and personal data on the laptop. I expected that the contents of the laptop would remain private.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of March 2021.


Richard Hall